

September 18, 2003

E-Filed

The Honorable J. Frederick Motz
United States District Court for
the District of Maryland
101 West Lombard Street
Baltimore, Maryland 21201

RE: Litzinger v. McGuirk
Civil Action No.: JFM-02-4115

Dear Your Honor:

In compliance with the Scheduling Order issued September 8, 2003, the parties counsel have conferred and offer this joint letter:

1. Defendant Bradley A. McGuirk does not request an early settlement or ADR conference.
2. The parties counsel request 25 deposition hours per side as opposed to 15 hours, due to the anticipated number of witnesses.
3. The parties do not unanimously consent to proceed before a United States Magistrate Judge.

Additionally, the parties counsel request a 90 day extension of the discovery deadline and status report, as well as all subsequent dates, for a period of at least 90 days. This is believed to be necessary due to the number of health care providers to be involved in the discovery and the massive amount of medical records involved.

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The parties counsel thank Your Honor for his kind consideration.

Very truly yours,

Donald E. Hoffman
Assistant Attorney General
Maryland State Police

DEH:sds

cc: Duane A. Verderaime, Esquire